

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

CHRISTINE BORDEN,

Plaintiff,

v.

**BANK OF AMERICA, NA (“BANA”)
AND WESTCLIFF TECHNOLOGIES,
INC., D/B/A NATIONAL BITCOIN ATM,
AND CASH CLOUD, INC., D/B/A/ COIN
CLOUD,**

Defendants.

CASE NO.: 2:22-cv-04076-BHH

AMENDED RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES

Defendant Westcliff Technologies, Inc., dba National Bitcoin ATM (hereinafter “Westcliff”), pursuant to the Local Rules of the United States District Court for the District of South Carolina, submits its amended responds to the Court’s Local Rule 26.01 Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Westcliff is not aware of any person or legal entity with a subrogation interest in this action.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Although Plaintiff appears to have demanded a jury trial in the original Complaint, this defendant believes the matter should be tried non-jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent.

ANSWER: Westcliff is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: As alleged by Plaintiff, the alleged events giving rise to the Complaint occurred in and around Charleston County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

ANSWER: Westcliff is not aware of any cases related to this action.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or to the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Westcliff is not aware of other persons or entities liable in this matter.¹

¹ In preparing its original responses, Westcliff relied on Bank of America, N.A.'s interrogatory responses on its original interrogatory responses filed on December 21, 2022 (Entry No. 10) and this response was left in as an error. When as counsel for Westcliff learned of the clerical/transcription error, it prompted this amendment.

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Attorneys for Westcliff Technologies, Inc

January 10, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2023, I caused a true and correct copy of the foregoing documents to be served on the parties below via the Court’s ECF filing system, as follows:

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